

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Kevin Alton Walton, Debtor

**Case No. 24-02317-JAW
CHAPTER 12**

MOTION FOR AUTHORITY TO USE CASH COLLATERAL

COMES NOW the Debtor, Kevin Alton Walton (“Debtor”), by and through counsel, and pursuant to 11 U.S.C. § 363(c) and Rule 4001 of the Federal Rules of Bankruptcy Procedure, respectfully moves this Court for an order authorizing the use of cash collateral, and in support thereof states as follows:

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b)(2). Venue is proper under 28 U.S.C. § 1408 and 1409.
2. The Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on October 4, 2024. The case was later converted to a Chapter 12 on May 22, 2025. The Debtor is a self-employed logger operating under Walton Logging of MS, LLC.
3. The following creditors may claim a security interest in the Debtor’s cash collateral, including accounts, proceeds of timber sales, and business income:
 - Fora Financial Asset Securitization 2021, LLC, c/o Aubrey Thrasher, LLC, 3050 Peachtree Rd NW, Ste 240, Atlanta, GA 30305
 - SBA (U.S. Small Business Administration), 332 S Michigan Ave, Ste 600, Chicago, IL 60604
 - Notice also provided to:
 - U.S. Attorney, 501 E Court St, Ste 4.430, Jackson, MS 39201
 - U.S. Attorney General, 950 Pennsylvania Ave NW, Washington, DC 20530

- Secured Lender Solutions, P.O. Box 2576, Springfield, IL 62708
4. The Debtor requires the use of cash collateral to continue operating his logging business and to meet both ordinary and necessary business and household expenses. Use of cash collateral is essential to preserve the value of the estate and avoid immediate and irreparable harm
 5. A 30-day operating budget is attached hereto as Exhibit A, which outlines projected income of \$67,450.00 and expenses totaling \$60,843.42, resulting in net available income of \$6,606.58. In addition, the Debtor's household expenses total approximately \$1,850.00 monthly.
 6. The Debtor proposes to provide adequate protection to secured creditors by:
 - a) Maintaining insurance on equipment and assets;
 - b) Applying cash collateral solely in the ordinary course of business;
 - c) Preserving and protecting the value of the collateral through ongoing operations;
 - d) Providing monthly income and expense reports to interested secured parties and the Chapter 12 Trustee.
 7. The Debtor seeks authorization to use cash collateral as reflected in the attached budget and further requests that a final hearing be set if objections are filed or negotiations with creditors are not resolved.

WHEREFORE, PREMISES CONSIDERED, the Debtor respectfully requests that this Court enter an Order:

- a) Authorizing the use of cash collateral as outlined in Exhibit A;
- b) Scheduling a final hearing, if necessary;

- c) Finding that adequate protection is being provided to affected secured creditors;
- d) Granting such other and further relief as may be just and proper.

Respectfully submitted,

BY: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Motion for Authorizing to Use Cash Collateral was forwarded on June 16, 2025 to:

By First Class Mail:

Fora Financial Asset Securitization 2021, LLC c/o Aubrey Thrasher, LLC 3050 Peachtree Rd NW, Ste 240 Atlanta, GA 30305	SBA c/o U.S. Attorney 501 E Court St. Ste 4.430 Jackson, MS 39201
Secured Lender Solutions P.O. Box 2576 Springfield, IL 62708	U.S. Attorney General, 950 Pennsylvania Ave NW Washington, DC 20530
SBA (US Small Business Administration) 332 S Michigan Ave, Ste 600 Chicago, IL 60604	

By Electronic CM/ECF Notice:

U.S. Trustee

Harold J. Barkley, Jr. Chapter 12 Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

CASE NO: 24-02317

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 6/16/2025, I did cause a copy of the following documents, described below,

Motion for Authority to Use Cash Collateral
Exhibit A

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 6/16/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

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3 **UNITED STATES BANKRUPTCY COURT**
4 **SOUTHERN DISTRICT OF MISSISSIPPI**
56 IN RE:
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8 Kevin Alton Walton
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106 CASE NO: 24-02317
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86 **CERTIFICATE OF SERVICE**
7 **DECLARATION OF MAILING**
86 Chapter: 13
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811 On 6/16/2025, a copy of the following documents, described below,
12
13 Motion for Authority to Use Cash Collateral
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15 Exhibit A
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19 were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient
20 postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth
21 herein.
22
23 The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above
24 referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of
25 Service and that it is true and correct to the best of my knowledge, information, and belief.
26
27 DATED: 6/16/2025
2824 
2526 Miles Wood
27 BK Attorney Services, LLC
28 d/b/a certificateofservice.com, for
 Thomas C. Rollins, Jr.
 The Rollins Law Firm
 702 West Pine St
 Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

FORA FINANCIAL ASSET SECURITIZATION
2021, LLC
C/O AUBREY THRASHER, LLC
3050 PEACHTREE RD NW, STE 240
ATLANTA GA 30305

FIRST CLASS

SECURED LENDER SOLUTIONS
P.O. BOX 2576
SPRINGFIELD IL 62708

FIRST CLASS

SBA (US SMALL BUSINESS ADMINISTRATION)
332 S MICHIGAN AVE, STE 600
CHICAGO IL 60604

FIRST CLASS

SBA
C/O U.S. ATTORNEY
501 E COURT ST. STE 4.430
JACKSON MS 39201

FIRST CLASS

U.S. ATTORNEY GENERAL
950 PENNSYLVANIA AVE NW
WASHINGTON DC 20530